

**From:** [Moore, Gary](#)  
**To:** [jeff.wright@westonsolutions.com](mailto:jeff.wright@westonsolutions.com)  
**Subject:** Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions  
**Date:** Tuesday, January 22, 2013 1:42:30 PM

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Gary Moore

Federal On-Scene Coordinator

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Cell: 214-789-1627

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----- Forwarded by Gary Moore/R6/USEPA/US on 01/22/2013 01:42 PM -----

From: David Abshire/R6/USEPA/US

To: Gary Moore/R6/USEPA/US@EPA

Date: 01/22/2013 01:35 PM

Subject: Re: Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

No ..... I do not know the cost; the PRP conducted the treatability study following the work plan I and ORD developed. I will try to get you the cost for the S/S I did at Texarkana Wood Preserving (used granular activated carbon [GAC] for sorption); and one at North cavalcade (used slag for decreased permeability instead of GAC).....if you need those costs, let me know and I will attempt to contact the contractor.

I read the email...

You will not be using a Subtitle D or C consolidation cell, because, as you stated, you are going to S/S in-place. Therefore, I don't see how the "land ban" requirements would enter into this (unless you develop swell material). Malone went with the Subtitle "C" because they could not decrease the SPLP to below the ground water protection levels. Based on the contaminants at your site (in-situ mixing), you may have to run SPLP and permeability - SPLP is to hold the dissolved ends, and permeability is to hold the source material.

Charles David Abshire

Arkansas/Texas Branch

Superfund Division

R6 Remedial Project Manager

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From: Gary Moore/R6/USEPA/US

To: David Abshire/R6/USEPA/US@EPA

Date: 01/22/2013 11:20 AM

Subject: Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

David:

Do you know what the cost for the treatability study was for Malone Services?

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----- Forwarded by Gary Moore/R6/USEPA/US on 01/22/2013 11:19 AM -----

From: "Wright, Jeff" <Jeff.Wright@WestonSolutions.com>

To: Gary Moore/R6/USEPA/US@EPA

Cc: "Bordelon, David" <David.Bordelon@WestonSolutions.com>

Date: 01/22/2013 11:12 AM

Subject: RE: FW: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

The \$700 is for the proposal report only. Treatability tests can be fairly expensive, which is why I would like a detailed proposal for you to review. You might want to talk to your contact that knows about the Malone Service Co. site and see what their Treatability costs were like.

***Jeff Wright, CHMM***

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**From:** Moore.Gary@epamail.epa.gov [<mailto:Moore.Gary@epamail.epa.gov>]

**Sent:** Tuesday, January 22, 2013 10:59 AM

**To:** Wright, Jeff

**Subject:** Re: FW: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

The cost looks fine to me. Does this include the analyses?

Gary Moore

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From: "Wright, Jeff" <[Jeff.Wright@WestonSolutions.com](mailto:Jeff.Wright@WestonSolutions.com)>

To: Gary Moore/R6/USEPA/US@EPA

Cc: "Bordelon, David" <[David.Bordelon@WestonSolutions.com](mailto:David.Bordelon@WestonSolutions.com)>

Date: 01/22/2013 10:44 AM

Subject: FW: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Gary –

I've got a call in to our Treatability Lab rep. I will go over the treatability study outline indicated in the emails below and ask them to add the TCLP and TPH analyses for the initial characterization analysis. I just want to confirm the treatability study process and make sure we have all the info they need to provide an adequate cost proposal. After speaking with the lab, I'll provide you with a summary of the discussion. If you agree with the treatability outline I will then request the proposal report. After reviewing previous emails with the lab, it appears the cost of the treatability study proposal will be around \$700. Let me know what you think.

Thanks,

***Jeff Wright, CHMM***

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**From:** Wright, Jeff

**Sent:** Friday, January 18, 2013 9:18 AM

**To:** 'Moore.Gary@epamail.epa.gov'

**Cc:** Bordelon, David

**Subject:** RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Gary –

I would go ahead and run the TCLP and TPH analyses. If the samples pass TCLP, land ban criteria will not apply. If not, the 90% reduction (or 10x UTS) may be difficult to meet.

***Jeff Wright, CHMM***

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**From:** [Moore.Gary@epamail.epa.gov](mailto:Moore.Gary@epamail.epa.gov) [<mailto:Moore.Gary@epamail.epa.gov>]

**Sent:** Thursday, January 17, 2013 11:26 PM

**To:** Wright, Jeff

**Subject:** RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Jeff:

My only questions, should we do TPH, TCLP on the samples taken out of the pits. This will be additional data to make sure that we do or don't have a haz waste now and when we complete the solidification.

I am also wondering if we should use the land ban criteria or if that would be too stringent for us to meet after solidification/stabilization.

Thanks

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From: "Wright, Jeff" <[Jeff.Wright@WestonSolutions.com](mailto:Jeff.Wright@WestonSolutions.com)>

To: Gary Moore/R6/USEPA/US@EPA

Cc: "Bordelon, David" <[David.Bordelon@WestonSolutions.com](mailto:David.Bordelon@WestonSolutions.com)>

Date: 01/17/2013 04:29 PM

Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

I would recommend the following:

- We will need to have characterization analysis conducted on the Treatability samples which include; pH, Bulk Density, Solids and Water Content, Total Oil and Grease and SPLP SVOCs and Metals.
- Use the UCS criterion of 10 psi, 25 psi and 50 psi as the primary goals. Once these are achieved analyze the treated material for permeability and SPLP.
- Regarding the reagents, the recommended formulations from the Malone site included Portland Cement, quicklime and fly ash. At the Bayou Trepagnier site they used a mixture of cement and lime (10%) and a separate 50:50 mixture of fly ash and bed ash at 10-15%. I would suggest using the same ones. We could begin by suggesting using the exact same ratios as above but the lab may have some suggestions after they run the characterization analysis (Solids and water content will probably influence the mixture ratios).

The lab had also requested COC concentration reduction goals along with the permeability criteria. We could use the SPLP analysis and permeability tests as supplemental data and not treatability test criteria. John Halk stated that they did not obtain SPLP or permeability data during their solidification/stabilization process. I think it would be a good idea to get this data and see where it stands after reaching the 10, 25 and 50 psi UCS. If it looks like the SPLP and/or permeability results are a concern we could adjust the reagent formulations or you may determine that this is not a viable clean up option without conducting additional tests.

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**From:** [Moore.Gary@epamail.epa.gov](mailto:Moore.Gary@epamail.epa.gov) [<mailto:Moore.Gary@epamail.epa.gov>]

**Sent:** Thursday, January 17, 2013 3:28 PM

**To:** Wright, Jeff

**Cc:** Bordelon, David

**Subject:** RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Jeff:

Do you have recommendations for the information that they would need, at this point I don't.

Thanks

Gary Moore

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From: "Wright, Jeff" <[Jeff.Wright@WestonSolutions.com](mailto:Jeff.Wright@WestonSolutions.com)>

To: Gary Moore/R6/USEPA/US@EPA

Cc: "Bordelon, David" <[David.Bordelon@WestonSolutions.com](mailto:David.Bordelon@WestonSolutions.com)>



Date: 01/17/2013 12:39 PM

Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

I've looked over that report and noted the following observations:

- 1) The two primary objectives were for the treated material to meet requirements for either RCRA Subtitle C- or RCRA Subtitle D-equivalent on-site disposal cell

Subtitle C requirements - UCS greater than 25 psi with no free liquids

Subtitle D requirements - UCS greater than 50 psi with no free liquids, permeability less than  $1 \times 10^{-6}$  cm/sec and SPLP contaminant concentrations less than Texas Class 3 groundwater standards

- 2) They were able to meet the Subtitle C requirements but none of their formulations met the Subtitle D requirements.

It is stated that hazardous contaminants are present in the samples (i.e. benzene, methylene chloride); however they still provide recommended formulations to meet Subtitle C requirements. Would be interested to see if they went with the Subtitle C requirements.

- 3) Using cement, quicklime and fly ash, the average volume increase was around 14%

I also spoke with John Halk again today. He reconfirmed that at the Bayou Trepagnier site their solidification/stabilization criteria was 8 psi UCS. No SPLP analyses were conducted. He does not seem too concerned about SPLP, but it would probably be a good idea to have that data. May be we should set our UCS criteria at 10, 25 and 50, which would correspond to the Subtitle C and D requirements.

I would like to go ahead and request a Treatability proposal from the lab (which we will need for any future work plan). Again the only information they need is the number of reagents we would like to use; the COC concentration reduction goals, along with the UCS and permeability criteria. This would provide a good cost quote.

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**Sent:** Wednesday, January 16, 2013 3:26 PM

**To:** Wright, Jeff

**Subject:** RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Get the report off of epaosc.net. Let me know when you get it so I can delete it.

[Malone TS Final Report.pdf](#)

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